

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

In re DAVIS NEW YORK VENTURE FUND
FEE LITIGATION

Master File No. 1:14-cv-4318 (LTS) (HBP)

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**JOINT STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DISCOVERY DEADLINES**

WHEREAS, on December 17, 2015, the Court entered Pre-Trial Scheduling Order No. 1 (Dkt. No. 78), as amended by order dated January 20, 2016 (Dkt. No. 82) (the "Scheduling Order");

WHEREAS, Paragraph 2.c. of the Scheduling Order requires all fact discovery to be completed by June 18, 2017, and Paragraph 2.e. of the Scheduling Order requires all expert discovery to be completed by January 12, 2018;

WHEREAS, Paragraph 7(b) of the Joint ESI Submission and Order entered April 1, 2016 (Dkt. No. 84) estimated that Defendants would complete their production of ESI by December 18, 2016;

WHEREAS, Plaintiffs anticipated that they would have approximately six months to complete depositions and other follow-up fact discovery subsequent to completion of Defendants' production;

WHEREAS, Defendants' substantial production of documents and ESI has been more time-consuming than anticipated, with a presumptively final production served on Plaintiffs on May 1, 2017;

WHEREAS, Plaintiffs diligently have been reviewing and continue to review Defendants' production as documents and ESI are received;

WHEREAS, the parties have continued to cooperate on matters related to discovery related to this action;

WHEREAS, Plaintiffs anticipate beginning depositions in mid-June 2017;

WHEREAS, the parties agree that 60 additional days will be necessary to complete fact discovery; and

WHEREAS, there have been no prior extensions of the deadlines in the Scheduling Order;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties through their undersigned counsel, and subject to the Court's approval, that:

1. The fact discovery cut-off in Paragraph 2.c. of the Scheduling Order shall be extended by 60 days to August 17, 2017;
2. The expert discovery cut-off in Paragraph 2.e. of the Scheduling Order shall be extended by 60 days to March 13, 2018; and
3. All other deadlines remain as set forth in the Scheduling Order.

May 12, 2017

Respectfully submitted,

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May 12, 2017

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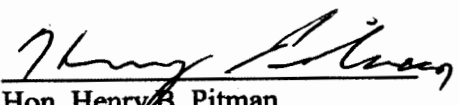
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IT IS SO ORDERED.

Dated: May __, 2017


Hon. Henry B. Pitman
United States Magistrate Judge
6-12-17